

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,	:	
	:	No. 15 Cr. 536 (PGG)
	:	ECF CASE
v.	:	
KALEIL ISAZA TUZMAN,	:	ORAL ARGUMENT
	:	REQUESTED
Defendant.	:	
	:	

**DEFENDANT KALEIL ISAZA TUZMAN'S NOTICE OF MOTION TO COMPEL
PRODUCTION OF RULE 16 DISCOVERY, *BRADY, GIGLIO* AND JENCKS ACT
MATERIALS, AND FOR A DECLARATION THAT THE PRODUCED MAIDEN
DOCUMENTS ARE NOT PRIVILEGED**

PLEASE TAKE NOTICE that, upon the annexed Declaration of Joshua D. Liston, Esq., the exhibits thereto, and the accompanying memorandum of law, defendant Kaleil Isaza Tuzman will move this Court before the Honorable Paul G. Gardephe at the United States District Courthouse, 40 Foley Square, New York, New York 10007, at such a date and time as the Court may direct, for an Order directing the United States of America to produce Rule 16 Discovery, *Brady, Giglio* and Jencks Act Materials, and for a Declaration That the Produced Maiden Documents Are Not Privileged, and granting such other and further relief to which the Court deems the defendant entitled.

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

Dated: New York, New York
October 19, 2016

Respectfully submitted,
BEYS LISTON MOBARGHA & BERLAND LLP

By: /s/ Joshua D. Liston

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Attorneys for Defendant Kaleil Isaza Tuzman

CERTIFICATE OF SERVICE

I hereby certify that on October 19, 2016, I caused a true and correct copy of the foregoing to be served by electronic means, via the Court's CM/ECF system, on all counsel registered to receive electronic notices.

/s/ Joshua D. Liston

Joshua D. Liston